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April 2, 2025

Hon. Valerie Figueredo, U.S.M.J.  
Daniel Patrick Moynihan Courthouse  
500 Pearl St., Courtroom: 17A,  
New York, NY 10007

**Via Electronic Filing**

Re: Diaz v. Ker Geotech et al. 1:25-cv-01450

Dear Judge Figueredo:

This firm represents Ker Geotech Inc., Gabriel Circiu & Mike Stoica, defendants in the above referenced matter. This letter is to request a 30 day extension of the defendants' time to respond to the complaint. The reason for this adjournment is that I was recently retained and need time to review the matter and attempt to explore early settlement of the dispute. My adversary has consented to this application.

Very truly yours,

Avram E. Frisch

Cc: Michael Faillace, Esq.